

# EXHIBIT

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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to:  <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN)  ECF Case

**DECLARATION OF GERALDINE TEXEIRA**

I, GERALDINE TEXEIRA, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was employed as a maintenance worker in the North Tower of the World Trade Center, a job I had held since 1973.

4. At the time of the terrorist attacks on 9/11, I was cleaning an office bathroom on the 82nd floor of the North Tower. When the first passenger jet struck the North Tower, I thought that a bomb had possibly exploded on the floors above. I heard parts of the building beginning to crumble, so I immediately ran to the stairwell to evacuate the building.

5. In the process of running down over eighty flights of stairs, I slipped and rolled down four or five of the cement steps, injuring my head, neck, back, and shoulders. After I fell to the floor in the stairwell, I received additional injuries when I was trampled by people who were

also running down the stairs in the mass hysteria to exit the building. Thankfully, some of my coworkers helped me to stand up despite my injuries so that I could continue to descend the stairs.

6. Due to my closed head wound and the extreme pain in my neck, back, and shoulders, I was forced to slowly walk down the remaining steps until I was able to exit the North Tower. Upon exiting the building, I encountered carnage and unspeakable horrors. I then left the area of Ground Zero as quickly as possible given my injuries as I feared that the North Tower would collapse.

7. As a result of the terrorist attacks on the World Trade Center Towers on 9/11, I suffered and continue to suffer from the following physical injuries: a cerebral concussion with post-concussion syndrome and lingering headaches; posterior disc herniations in my neck at the C3/C4, C4/C5, and C5/C6 levels with anterior disc protrusions; reversed cervical lordosis; posterior herniations of my back at the L5/S1 level; posterior disc bulging in my lumbar spine at the L1/L2 and L4/L5 levels; bilateral sciatic radiculopathy in both legs; and a torn right rotator cuff and bilateral shoulder sprains which resulted in surgery on my right shoulder.

8. Due to my injuries and my loss of the enjoyment of life, I have been unable to return to work at my job as a maintenance worker since the events of 9/11.


9. The carnage and horror that I witnessed on 9/11 is emblazoned in my memory. During the course of these terrorist attacks and my escape, I witnessed atrocities beyond the imagination of the average citizen. During my escape, I encountered death and dismembered bodies. The situation could only be compared to a war zone. Thus, as a result of these terrorist attacks and the events that I witnessed, I also began to suffer profound post-traumatic stress, anxiety, depression, and sleep disturbances.

10. I sought and continue to seek medical attention on a monthly basis for my injuries caused by these terrorist attacks. Attached as Exhibit B to this Declaration is a true and correct copy of my select relevant medical records related to the treatment that I received for my physical and emotional injuries following the September 11, 2001 terrorist attacks.

11. I previously pursued a claim through the September 11<sup>th</sup> Victim Compensation Fund (Claim No. 212-001208) specifically related to the physical injuries that I suffered on September 11, 2001, and my claim was determined to be eligible for compensation.

I DECLARE, VERIFY AND STATE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 16 day of January 2020.

  
GERALDINE TEXEIRA

**EXHIBITS  
FILED  
UNDER SEAL  
(ECF No.  
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